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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: 02 NOV 1990

SUBJECT: Water Division Review of the Draft Alternative Array Report for the Pagel's Pit Site, Rockford, Illinois

FROM: Dale S. Bryson
Director, Water Division

TO: David A. Ullrich
Director, Waste Management Division

The Water Division has reviewed the Draft Alternative Array Report for the Pagel's Pit site, as requested by the Office of Superfund. Our comments follow the background summary.

Background

Pagel's Pit is an active solid waste landfill west of the Acme Solvent National Priority List site. Both sites are sources of ground water contamination, especially by volatile organic chemical's (VOC) and semi-volatiles, pesticides and polychlorinated biphenyls (PCB), with Acme Solvent most likely being the source of the VOCs and PCBs. Most of the inorganic content are naturally occurring alkaline earth metals, with toxic metals being arsenic, barium, cadmium and manganese. Cyanide was also found at the site.

The Pagel landfill is bounded on the west by Killbuck Creek which drains to Kishwaukee River. A seasonal or intermittent stream runs north of the site and empties into Killbuck Creek. Ground water flow is generally from east to west intersecting Killbuck Creek. Vertical movement of the ground water has been inferred.

Water Quality Permits

The Remedial Project Manager asked specifically for help with identifying ARARs for the alternative remedial actions. The following action-specific Clean Water Act sections apply for disposal of treated or untreated leachate and ground water to a Publicly Owned Treatment Works (POTW):

40 CFR 122.42 - Notification to permit issuing authority of reevaluation of POTW pretreatment standards.

40 CFR 122.44 - Establishing limitations, standards and other permit conditions.

40 CFR 122.50 - Disposal of pollutants into POTWs

40 CFR 403 - Pretreatment Standards

To be considered for the above situation:

40 CFR 258, 501, 503 - Proposed sludge disposal, criteria and State sludge programs - Please contact John O'Grady, Permits, Sludge Coordinator, at 3-1938 for the latest information on promulgated regulations concerning sludge.

Other ARARs seem to be covered in Table 7 for discharge to a surface water except for:

40 CFR 122.26 - Storm water discharges (applicable to State NPDES Programs; see Section 123.25) (Site-specific)

40 CFR 122.44 - Establishing limitations, standards and other permit conditions.

40 CFR 122.44(d)(1) - Water Quality Based Effluent Limits 1 (Site-specific) (M. Thielke, 3-8841)

Drinking Water Section

The potential applicable, relevant and appropriate requirements (ARAR) for this site include the Safe Drinking Water Act (SDWA) maximum contaminant levels (MCL) and non-zero maximum contaminant level goals (MCLG).

The enclosed list details the current MCLs and MCLGs.
(T. Matheson, 6-6204)

Ground Water Protection Branch

We would like to point out that Illinois is in the process of developing ground water protection standards. The current draft of the standards relies on MCL values and health advisories for remediation standards. The Remedial Project Manager should keep the State standard development process in mind when developing the Remedial Action Plan.
(B. Melville, 6-1504)

The Water Division appreciates the opportunity to review the subject document. If you have any questions regarding these comments, please contact the indicated program staff reviewer.

Attachment

cc: Bernard Schorle

Table 20
Summary of
National Primary Drinking Water Regulations
(as of May 1990)

Contaminant	MCLG[1]	MCL[1]
Microbiological Contaminants		
Coliforms (total)	0	1/100 ml [2]
Giardia Lamblia	0	TT[3]
HPC	—	TT[3]
Legionella	0	TT[3]
Virus	0	TT[3]
Turbidity	—	1-5 NTU[4]
Inorganic Contaminants		
Arsenic	—	0.05
Barium	—	1
Cadmium	—	0.010
Chromium	—	0.05
Fluoride	4.0	4.0
Lead	—	0.05
Mercury	—	0.002
Nitrate	—	10
Selenium	—	0.01
Silver	—	0.05

1 In milligrams per liter (mg/l) unless otherwise noted.
2 Revised regulations will be based on presence/absence concept rather than an estimate of coliform density: effective December 1990.
3 TT- Treatment Technique requirements established in lieu of MCLs: effective beginning December 1990.
4 Revised regulations will establish treatment technique requirements rather than an MCL for turbidity: effective beginning December 1990.

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Table 20 Cont'd

Contaminant	MCLG[1]	MCL[1]
Organic Contaminants		
2,4-D	—	0.1
Endrin	—	0.0002
Lindane	—	0.004
Methoxychlor	—	0.1
2,4,5-TP Silvex	—	0.01
Benzene	0	0.005
Carbon tetrachloride	0	0.005
P-Dichlorobenzene	0.075	0.075
1,2-Dichloroethane	0	0.005
1,1-Dichloroethylene	0.007	0.007
1,1,1-Trichloroethane	0.20	0.20
Trichloroethylene	0	0.005
Vinyl chloride	0	0.002
Total trihalomethanes (Chloroform, Bromoform, Bromodichloromethane, Dibromochloromethane)	—	0.10
Radionuclides		
Gross alpha particle activity	—	15 pCi/l
Gross beta particle activity	—	4 mrem/yr
Radium 226 and 228 (total)	—	5 pCi/l